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January 10, 2001

Mr. David Waddell
Tennessee Regulatory Authority
460 James Robertson Pkwy.
Nashville, TN 37243-0505

RE: In the Matter of Notice of Rulemaking Amendment of Regulations For Telephone Service Providers. Docket No. 00-00873

Dear Mr. Waddell:

Enclosed for filing are Industry Member's suggested revisions to the proposed rules which will be addressed during Workshop I. No rules other than those specifically referred to in the filing have been addressed, nor should any inferences be made from these suggestions as to such remaining rules.

This filing was the result of a conference call and discussion among the listed Industry Members.¹ Because of the wide range of interests of the parties, complete consensus was neither expected nor achieved. However, the Members were able to agree on a large number of issues that are memorialized in the consensus filing. The Members submit they should be given great weight as they are the result of agreements between parties with disparate and, often times, conflicting interests.

One caveat should be noted, however. Given the breadth of the subject matter covered, there were some issues that, although the parties recognized a need for change, the specifics of such change could not be fully resolved in the time allowed. Thus, an attempt was made by the drafting party to propose a resolution in the consensus draft. These draft proposals may not satisfy all parties and they are free to make and should present their position on any such matter. Again, because of the schedule we are under there was simply not sufficient time to make sure all of these issues were, or could be, resolved. Further, as noted in the Suggested

¹ E-Spire and X-O Communications were invited to join the conference call but because of conflicts or other reasons could not do so. A copy of the Suggested Revision was provided to them, however.

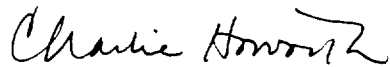
Revisions, the fact that a particular provision of these rules is neither underlined or stricken through is not an indication that an Industry Member does not object to that provision. Rather, it may only indicate that the Industry Members were unable to reach a consensus as to how the provision(s) should be modified.²

The end result is that the members have undertaken in good faith to resolve those issues that could be resolved and, failing that, are providing under separate cover their individual responses to the portion of the proposed rule in issue.

With the foregoing predicate, the Industry members would make one final point: The Industry members believe that we have made a substantive and important effort in reading the consensus revisions and that they should be recognized and acted upon as such.

On behalf of the Industry Members,

Very truly yours,

A handwritten signature in black ink, appearing to read "Charlie Howorth".

Charles L. Howorth, Jr.

Enclosures

² For example, the Industry Members disagree as to the inclusion of §1220-4-2.09 and their position thereon shall be included in their respective comments.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

Re: In the Matter of Notice of Rulemaking Amendment of Regulations for Telephone Service Providers

Docket No. 00-00873

**"INDUSTRY MEMBERS'" CONSENSUS SUGGESTED REVISIONS TO
THOSE PROVISIONS OF THE PROPOSED RULES THAT
WILL BE ADDRESSED DURING WORKSHOP I**

Pursuant to the Order the Hearing Officer entered in this docket on December 15, 2000, the following entities ("Industry Members") have jointly reviewed those provisions of the proposed rules that will be addressed during Workshop I on January 16, 2001:

Admore
ASCENT
AT&T
BellSouth Telecommunications, Inc.
CenturyTel
Citizens Communications
e.spire
Loretto
MCI WorldCom, Inc.
NewSouth Communications Corporation
SECCA
Sprint Communications Company L.P.
TEC Companies
TDS Telecom
Time Warner Telecommunications
United
United Telephone-Southeast
U.S. LEC
XO Communications

This document sets forth the Industry Members' consensus suggested revisions to the proposed rules as follows.

I. EXPLANATION OF CONSENSUS SUGGESTED REVISIONS

Each proposed rule that will be addressed during Workshop I is set forth below. To the extent that the Industry Members have reached a consensus regarding proposed revisions to these rules, the proposed revisions are indicated by either striking through language that should be deleted from these proposed rules or by underlining language that should be added to these proposed rules. The fact that a particular provision of these rules is neither underlined nor stricken through is not an indication that an Industry Member does not object to that provision. Rather, it may only indicate that the Industry Members were unable to reach a consensus as to how the provision should be modified. In such instances, each Industry Member reserves the right to address such provisions during Workshop I and to file written comments regarding such provisions.

II. CONSENSUS SUGGESTED REVISIONS

1220-4-2-.01

Definitions

In the interpretation of these rules, the following definitions shall be used:

- (1) As used in this rule, the term "Applicant" means a person requesting ~~service through~~ Lifeline or Link-Up service.
- (2) "Authority" or "TRA" means the Tennessee Regulatory Authority.
- (3) "Basic Local Exchange Telephone Service" means telecommunications services as defined in Tenn. Code Ann. § 65-5-208 (a)(1).
- (4) "Busy season" means the period of the year during which the greatest volume of traffic is handled in the office.
- (5) ~~"Carrier of last resort" means the required offering of ubiquitous basic local exchange services throughout a designated service area by an ETC qualified to receive federal and state universal service support using its own facilities or a combination of its own facilities and resale of another carrier's services, including the services offered by another ETC.~~

"Carrier of last resort obligation" means the obligation, imposed by order of the Authority pursuant to 47 U.S.C. §214(e)(3), to provide services that are supported by Federal universal service support mechanisms under 47 U.S.C. §214(c) to an unserved community or any portion thereof that requests such service.

- (6) "Customer" means any person, firm, partnership, corporation, municipality, cooperative organization, governmental agency, etc., provided with telephone service by a local telecommunications service provider.
- (7) "ETC" means eligible telecommunications carriers as defined in USCA Title 47, Section 214(e) and ~~is certified~~ as designated by the Authority ~~to receive state or federal universal service support~~ as an eligible telecommunications carrier for a service area designated by the Authority.
- (8) "Exchange" means a unit established by a local telecommunications service provider for the administration of telephone service in a specified area which usually embraces a city, town, or village and its environs. It consists of one or more central offices together with associated plant used in furnishing communication service in that area.
- (9) "Incumbent local exchange ~~carrier~~ telephone company" means a public utility offering and providing basic local exchange telephone service, as defined by TCA §65-5-208(a)(1), pursuant to tariffs approved by the Tennessee Public Service Commission prior to June 6, 1995.
- (10) "Lifeline" means an income-tested telephone assistance program whereby qualified residents can obtain a ~~discount on~~ credit applicable to their basic monthly local telephone service.
- (11) "Link-~~u~~Up" means an income-tested telephone assistance program whereby qualified residents can obtain a ~~discount~~ credit on the one-time charge for the installation or the transferring of telephone service.
- (12) ~~"Local Number Portability ("LNP")" means the ability of a customer to retain the same telephone number when changing local telecommunications service providers, as long as the customer stays within the same general geographic area.~~¹
- (13) ~~"NANPA" means the North American Numbering Plan Administrator appointed by the FCC with the responsibility to oversee the administration of the telephone numbering system for North America.~~

¹ Given the current level of activity in the industry at both the federal and state levels with regard to numbering issues, the Industry Members suggest that the TRA not adopt rules on this subject. Otherwise, the TRA may have to initiate a rulemaking proceeding each time a new FCC order is issued in order to bring such rules into compliance with the then-current state of the law.

- (124) "Peak-traffic hour" means the period of the day during which the greatest volume of traffic is handled in the telephone central office.
- (135) "QSM" means quality service mechanisms designed to penalize ETCs for repeatedly providing poor quality telephone service by monetarily compensating the appropriate customer.
- (146) "Rate Center" means a geographic location used by telecommunications carriers to establish the point to point mileage necessary for accurate and consistent billing for both local and toll calls.
- (176) "Local Reseller" means a Local Telecommunications Service Provider which ~~purchases tariffed network services from a facility-based carrier to provide local and/or long distance service to end users~~ telecommunications services from another telecommunications carrier for the purposes of providing telecommunications services to the public.
- ~~(18) "Sequential Number Assignment" means the assignment of telephone numbers within one 1,000 block prior to assigning telephone numbers from another unused 1,000 block of numbers.~~
- (179) "Service area" means the ~~franchise geographic area where an incumbent local exchange carrier~~ in which a local telecommunications service provider provides basic local exchange telecommunications services within the State of Tennessee.
- (1820) "Soft dialtone" means local service limited to access to emergency 911 service.
- (1924) "Tariff" means the entire body of rates, tolls, charges, classifications and rules, adopted and filed with the Authority by a telecommunications service provider.
- (202) "Local Telecommunications Service Provider" means any provider of local exchange service as defined in Tenn. Code Ann. §65-4-101(c) and includes, but is not limited to, incumbent local exchange carriers ("ILEC"), competitive local exchange carriers ("CLEC") and resellers. To the extent that a telecommunications service provider provides interexchange services, that telecommunications service provider is not a local telecommunications service provider.
- (213) "Telephone Assistance Program" refers to Lifeline and Link-Up.
- (224) "Trouble Report" means any oral or written report from a subscriber or user of telephone service relating to a physical defect or to difficulty or dissatisfaction with the operations of telephone facilities. ~~One report shall be counted for each oral or written report received even though it may~~ Reports which duplicate a previous report or merely involve an inquiry concerning progress on a previous report shall not be counted as a trouble report. Also, a separate report shall be

~~counted for each telephone reported in trouble when several items are reported by one customer at the same time, unless the group of troubles so reported is clearly related to a common cause.~~

~~(25) "Uncontaminated 1,000 Number Blocks" means a clean block of 1,000 numbers from which no individual telephone numbers have been assigned.~~

~~(236) "Underlying carrier" means the telecommunications service provider carrier supplying the tariffed telecommunications services or facilities to that a local reseller for the provisioning of basic or long distance service provides to the public.~~

1220-4-2-.02 Scope of Regulations

The purpose of this Chapter is to establish minimum quality of service standards and general regulations for all local telecommunications service providers providing telecommunications service, as defined in this Chapter. The regulations are designed to ensure that Tennesseans continue to have access to quality telephone services in an emerging competitive telecommunications environment. This Chapter attempts to balance our state's policy of pro-competition in the telecommunications sector with the service quality expectations of our citizens as well as privacy concerns.

1220-4-2-.03 Records and Reports

(1) Location of Records.

Unless otherwise authorized by the Authority, all records of local telecommunications service providers required by this Chapter or any other Authority rule shall be kept within the State or shall be made available to the Authority or its authorized representative upon request. ~~at no cost. If out of state travel is required by the Authority to view such records, the telecommunications service provider shall reimburse the Authority for reasonable travel expenses.~~

(2) Retention of Records

Local telecommunications service providers shall maintain sufficient records necessary to verify and substantiate all requirements of this Chapter. ~~These records include, but are not limited to, trouble reports, service orders, itemized customer billing records, customer deposits and customer complaints. All records required by this Chapter shall be retained for a period of two (2) years unless otherwise ordered by the Authority.~~

(3) Out-of-Service Report

- (a) Local telecommunications service providers are required to notify the Authority by the methods listed below regarding disruptions of service when greater than 1000 customers lose service for greater than four (4) hours. In the event of such a disruption, the local telecommunications service provider shall

~~1. Contact the Authority within two (2) hours of the service disruption or if during non-work hours, at the beginning of the succeeding workday and provide the location of the disruption, number of customers affected, and estimated restoral time.~~

~~2.~~ provide a written report within thirty (30) days of the incident to the Authority detailing the disruption along with actions the Local Telecommunications Service Provider has or shall take to prevent a similar disruption from occurring again.

(4) Tariffs

- (a) Telecommunications service providers shall file with the Authority tariffs that set forth the conditions and circumstances under which services will be provided as prescribed in Chapter 1220-4-1.

- (b) A telecommunications service provider shall make available a copy of its tariffs available for public inspection. Public inspection shall also may include, but not limited to, having a copy of the tariffs available on the Internet.

(5) Exchange Maps

ETCs shall file with the Authority an exchange area map for each of its exchanges within the state clearly showing the boundary lines sufficient in detail to reasonably permit locating the exchange service area in the field.

(6) Wireline Reports

Until the Authority deems it unnecessary to continue doing so, each Local Telecommunications Service Provider shall provide to the Authority a summary of its wireline activity within the State on the first working day of each month quarterly in a format established by the Authority. This information shall allow the Authority to monitor the evolution of local competition within Tennessee. Because these reports contain confidential and competitively sensitive information, they shall be treated as Proprietary by the TRA and shall not be subject to public disclosure.

~~(7) Telephone Number Utilization Reports~~

~~Each Local Telecommunications Service Provider shall provide telephone number utilization data to the Authority on the forms provided by the Authority, as authorized by the Federal Communications Commission.~~

(78) Service Reports

Each Local Telecommunications Service Provider shall furnish to the Authority, upon reasonable notice and in the form the Authority may reasonably request, at such time and in such form the results of any tests, summaries or records or any other information as the Authority may reasonably require. Nothing in this rule shall be construed as requiring any telecommunications service provider to waive any common law or statutory privilege or objection, including without limitation the attorney-client privilege.

(89) Adequacy of Service Reports

Each ETC shall submit to the Authority quarterly reports in a format established by the Authority that will allow the Authority to determine how well it is complying with the adequacy of service standards found in 1220-4-2-.17. The reports shall be itemized by month by local exchanges at the state-wide level. The Authority may conduct periodic audits or require the ETCs to hire an independent firm to verify accuracy of service standard reporting.

(910) Interruption of Service Reports

Each Local Telecommunications Service Provider shall maintain an accurate record of trouble reports made by its customers. This record shall include such information as the customer name, and the time, date and nature of the trouble along with the action taken by the Local Telecommunications Service Provider to clear the trouble or satisfy the complaint. This record shall be available to the Authority or its authorized representative upon request.

(104) Miscellaneous Reports

Upon reasonable notice, Telecommunications Service providers shall provide any other report ordered by the Authority or reasonably requested by the Staff through the Executive Secretary's office.

1220-4-2-.09

Directories (White Pages)

- (1) ~~Telephone directories shall be published annually.~~ Local telecommunications service providers shall regularly publish or cause to be published telephone directories which and shall contain at a minimum the name, address and telephone number of all customers, except public telephones and those customers who have

informed the Local Telecommunications Service Provider to not list their information.

- (2) All local telecommunications service providers shall ~~provide~~ make available free of charge to ~~its~~ their customers a white page telephone directory ~~encompassing the local calling area~~ for the area where the customer is located. Directories for areas outside the local calling area shall be ~~provided~~ made available to the customer for a reasonable cost.
- (3) ~~In the event of a Telecommunications Service Provider listing error or the omission of a customer listing, the Telecommunications Service Provider shall provide an intercept service along with directory assistance for all calls made to the omitted number, upon the request of the customer, for up to one (1) year at no charge or until the publishing of a new White Page Directory.~~
In the event of an error in the listed number of any customer, the telephone service provider shall intercept all calls to the listed number for a reasonable period of time, provided existing central office equipment will permit and the number is not in service. In the event of an error or omission in the listed name of a customer, such customer's correct name and telephone number shall be in the files of the information or intercept operators and the correct number furnished the calling party either upon request or interception.
- (4) The Authority's toll-free telephone number and Internet address shall be listed ~~on~~ in the inside cover front section of the directory. Local telecommunications Service Providers shall not charge the Authority for the listing of the above information.
- (5) A local telecommunications service provider shall provide the Authority, upon request and without charge, at least one (1) copy of its directories at the time of publication.
- (6) ~~The directory shall contain such instructions~~ Local telecommunications service providers shall provide local directory publishers with relevant information for publication concerning placing local and long distance calls, calls to repair, calls regarding billing questions as well as information services, and the mailing address of the local telecommunications service provider.
- (7) The area included in the directory along with the month and year of the issuance of or ~~month and year of the issuance of~~ intended period of use for the directory shall appear on the cover of the directory. Information pertaining to emergency calls such as for the police and fire department shall appear conspicuously in the front section of the directory.
- (8) Whenever any customer's telephone number is changed after a directory is published, the local telecommunications service provider shall intercept all calls

to the former number for a reasonable period of time and give the calling party the new number unless instructed otherwise by the customer with the new number.

- (9) Telecommunications service providers publishing White Page Directories must provide the opportunity to competitive local exchange carriers offering service within the calling scope of a directory to contract for the appearance of the competitive local service providers name and logo on the cover of such directories under the same terms and conditions as the telephone service provider provides to itself.

1220-4-2-.12 Customer Complaints

- (1) Each telecommunications service provider shall make a full and prompt investigation of customer complaints made either directly to it or through the Authority
- (2) Telecommunications service providers shall within ten (10) working days, after receipt of a complaint forwarded by the Authority, file a written reply with the Authority. This reply shall at a minimum state the Telecommunications Service Provider's position regarding the complaint and actions taken to resolve the dispute. The time for filing this reply may be extended for good cause shown.

1220-4-2-.13 Accuracy Requirements

All meters and/or recording devices used by telecommunications service providers to prepare customer's bills shall be in proper working order and shall render accurate readings. Telecommunications service providers shall retain sufficient records to substantiate to the customer or the Authority compliance with this section.

~~1220-4-2-.15 Prepaid Calling Cards²~~

- ~~(1) All prepaid calling cards shall provide adequate disclosure of the value of the card in either dollars or minutes. Such value shall be inclusive of any and all associated cost incurred with the purchase of the card. This information shall be displayed on the card or the package in a prominent and conspicuous manner.~~
- ~~(2) All prepaid calling cards shall list the name, address and telephone number of the Telecommunications Service Provider providing the prepaid card. A live operator shall answer the telephone number listed at least eight (8) hours a day, five (5) days a week.~~

² As will be more fully explained during Workshop I, a rule addressing prepaid calling cards raises significant jurisdictional, legal, policy, and operational issues. The Industry Members agree that if the TRA wishes to consider a proposed rule addressing prepaid calling cards, it should do so in a separate rulemaking proceeding.

- ~~(3) Under no circumstances shall the customer receive less value than that disclosed.~~
- ~~(4) If a card has a specific expiration date, such date shall be printed on the card in a prominent and conspicuous manner.~~
- ~~(5) Telecommunications service providers providing prepaid calling cards in the State shall respond to the Authority in writing within ten (10) working days of the receipt of consumer complaints.~~
- ~~(6) All prepaid cards shall provide all information relative to usage sensitive per minute rates and all other charges. This information shall be displayed on the card or the package in a prominent manner.~~

1220-4-2-.19

Lifeline and Link-Up

All ~~Telecommunications Service Providers~~ ETC's shall offer Lifeline and Link-Up in accordance with the conditions listed below.

~~(1) Eligibility Requirements~~

- ~~(a) A Tennessee resident is eligible for Lifeline and Link-Up if the person's total household income is equal to or less than 125 percent (125%) of the Federal Poverty Level Guideline or if he/she qualifies to receive any one of the following public assistance benefits:~~

- ~~1. Food stamps;~~
- ~~2. Medicaid (not TennCare);~~
- ~~3. Supplemental Security Income (SSI);~~
- ~~4. Temporary Assistance to Needy Families (TANF);~~
- ~~5. Low-income Home Energy Assistance Program (LIHEAP);~~
- ~~6. Federal Public Housing Support; and~~
- ~~7. Any other program or service certified by the Authority to assist low-income citizens.~~

~~(2)~~(1) Enrollment Procedures

- ~~(a)~~ Local ~~Telecommunications~~ service providers providing Lifeline and Link-Up shall accept and act on requests from applicants to provide the Telephone Assistance Programs in a timely manner.
- ~~(b)~~ Local ~~Telecommunications~~ service providers shall take reasonable steps to verify that an applicant qualifies for at least one of the qualifications listed in 1220-4-2-.19 (1).

- (c) An applicant determined eligible for Link-uUp is ~~automatically~~ eligible to receive Lifeline and shall be notified as such by the local telecommunications service providers providing the services.
- (d) ~~Disputes~~ In the event of a dispute between the a local telecommunications service providers that provides Lifeline and Link-Up service and an applicants regarding whether an the applicant meets the qualification criteria, the local telecommunications service provider shall inform the applicant that he or she has the right to be referred refer the dispute to the Authority for resolution.

~~(3)~~(2) Semi-Annual Verification Procedures

- ~~(a)~~ A Local Telecommunications Service Provider providing Lifeline and Link-uUp shall periodically verify during the months of January and July through the Tennessee Department of Human Services that its customers utilizing these telephone assistance programs continue to meet the qualification criteria embodied in this Rule Chapter.

~~(4)~~(3) Notification Procedures for Discontinuing Lifeline

- ~~(a)~~ ~~A Telecommunications Service Provider shall notify recipients of Lifeline during December and June of each year that in order to continue qualifying under the Federal Poverty Level Guidelines that supplemental information, as determined by the Authority, is needed to continue their eligibility for the telephone assistance. Failure to provide sufficient information within a reasonable period of time shall be grounds to terminate the Lifeline discount according to the condition below.~~

- ~~1.~~ A Local Telecommunications Service Provider shall provide Lifeline customers ~~60~~ 30 days notice that they no longer meet the qualification criteria for the ~~discounted~~ service and shall inform the applicant that he or she has the right to refer any dispute regarding the notification to the Authority for resolution. Such notice shall be in written form and shall disclose appeal rights for the decision to terminate the Lifeline discount through the Authority.

~~(5)~~(4) Lifeline Support Credits and Allowable Charges

- (a) Local Telecommunications service providers offering Lifeline and Link-uUp shall provide the maximum allowable discount as authorized by the FCC with the appropriate, if any, state matching credits full federal and state credit amounts, as reflected in approved tariffs, to their eligible end users .

(b) Lifeline credits shall not exceed basic local exchange telephone service charges.

~~(c) Lifeline recipients shall not be assessed a fee for local number portability by telecommunications service providers.~~

(d) Lifeline recipients shall not be assessed a state universal service fee, if one is established by the Authority.

(e) Lifeline recipients shall not be assessed a charge for toll blocking by local telecommunications service providers.

(f) Local Telecommunications service providers shall not assess qualified Lifeline customers a security deposit if said customer agrees to subscribe to a toll blocking service.

(g) Local Telecommunications service providers shall provide ~~a six (6) free~~ the same directory assistance call allowance ~~on directory assistance charges to Lifeline customers as they provide to non-Lifeline customers.~~

~~(6)~~(5) Link-Up Support Credits

(a) A qualified recipient shall receive a ~~reduction in the charge credit~~ for installing new service or ~~transferring moving~~ existing service to a new location as provided by the FCC.

~~(b) Qualifying low income customers who have paid full installation charges for service may retroactively receive the Link-Up credit on their telephone bill if they notify the telecommunications service provider within sixty (60) days from the date of the completion of the service order.~~

~~(c)~~(b) The purchase or installation of telephone equipment, such as the wiring of telephone jacks, does not qualify for Link-Up support.

~~(7)~~(6) Educational Outreach Efforts

(a) Local Telecommunications service providers ~~offering providing~~ Lifeline and Link-Up shall ~~establish a consumer outreach education plan, in coordination with the Authority, that will be~~ inform state agencies that administer financial assistance programs of the existence of the Lifeline and Link-Up services to assist these agencies in developing materials aimed at informing the low-income population within their service area of the availability of these telephone assistance programs.

(b) ~~At the time of the request for installation of new local service or the transferring of existing local service, telecommunications service~~

~~providers offering Lifeline and Link-Up shall inform all residential customers of the availability of telephone assistance programs and how to receive the discounts. A copy of the script used by telecommunications service providers shall be made available to the Authority upon request.~~
Local telecommunications service providers, working in cooperation with the Division, are required to place information in their White Pages telephone directory informing their residential telephone subscribers of the availability of telephone assistance programs and how to receive credits pursuant to such programs.

~~(8)~~(7) Lifeline and Link-Up Reporting Requirements

- (a) Local Telecommunications service providers providing Lifeline and Link-Up shall provide quarterly status reports to the Authority summarizing the number of customers receiving the benefits of the Telephone Assistance Programs. ~~The report shall breakdown the racial composition of the recipients along with the total dollar benefit for that period of time.~~
- (b) Local Telecommunications service providers shall provide other reports as required by the Authority in order to ensure compliance with this Rule Section.

1220-4-2-.22

Enforcement Provisions

Violation of the provisions of this Chapter shall be subject to the provisions of Tenn. Code Ann. § 65-4-120.

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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☒ Mail
☐ Facsimile
☐ Overnight

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